

[REDACTED]

National Park Service  
U.S. Department of the Interior

Harpers Ferry National Historical Park  
West Virginia, Maryland, Virginia

---



General Management Plan  
Record of Decision

Approved:

Margaret O'Dell 12/3/12  
Margaret O'Dell  
Regional Director, National Capital Region  
National Park Service

UNITED STATES DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE

RECORD OF DECISION

GENERAL MANAGEMENT PLAN  
ENVIRONMENTAL IMPACT STATEMENT

Harpers Ferry National Historical Park  
West Virginia, Maryland, Virginia

The Department of the Interior, National Park Service has prepared this Record of Decision on the *General Management Plan/Final Environmental Impact Statement* (GMP/EIS) for Harpers Ferry National Historical Park. This Record of Decision includes a description of the background of the project, a statement of the decision made, synopses of other alternatives considered, the basis for the decision, findings on impairment of park resources and values, a description of the environmentally preferable alternative, a listing of measures to minimize environmental harm, and an overview of public and agency involvement in the decision-making process.

BACKGROUND OF THE PROJECT

The purpose of the General Management Plan is to provide a comprehensive direction for resource preservation and visitor use and a basic foundation for decision making for the park for the next 15 to 20 years. The plan prescribes the resource conditions and visitor experiences that are to be achieved and maintained in the park over time. The clarification of what must be achieved according to law and policy is based on review of the park's purpose, significance, and special mandates.

DECISION (SELECTED ACTION)

Description of the Selected Action

The National Park Service will implement the selected alternative as described in the Final GMP/EIS issued in May 2009. The selected alternative will provide greater visitor enjoyment, increased access to park locales, more varied interpretation, and new life and excitement to Harpers Ferry National Historical Park.

Under the selected alternative, visitors will enter Harpers Ferry National Historical Park at Cavalier Heights where a visitor contact station will be improved to provide better orientation for park visitors and information on the park's many resources. It will be the starting point for an expanded transportation system that will allow visitors to reach areas of the park such as the Murphy Farm, Schoolhouse Ridge and Camp Hill that were previously difficult to access without a car. It will also be a stop on the new Around-the-Park trail that will allow visitors to hike to all areas of the park.

Preserved historic buildings, period shops, exhibits, and outdoor furnishings will complement the interpretation provided by rangers and possible period artisans/demonstrators that will revitalize this area. Traveling exhibits will be sought to supplement interpretation provided within the park. A smaller information center and bookstore will remain but possibly in new locations. Park artifact and museum object storage will be removed from the historic structures and the space converted to office use or other types of storage.

The Federal Armory will retain its current access. A study of the feasibility of returning John Brown's Fort to its original location will be undertaken. The train station will become a secondary portal to the site with proposed excursion trains arriving from Washington several days of the week. The armory canal will be restored and rewatered with the turbine also restored for interpretive purposes. The power plant will be rehabilitated for exhibits.

Virginus and Halls Islands will be preserved as an archeological preserve with ruins stabilized and outlined and wayside exhibits explaining the history and industrial development that was here.

Camp Hill will be managed with a campus atmosphere reminiscent of the Storer College era. Additional signs and waysides will allow visitors to get the feel of the site. Museum exhibits now in Lower Town will be moved to one or more of the Storer College structures to better explain the importance of Harpers Ferry to the story of the civil rights movement in America. Several historic buildings from the military occupation of Camp Hill will be restored and adaptively used for park headquarters. The historic Shipley School on Camp Hill is currently in poor condition. Further consideration will be required to determine potential future use.

The historic Grandview School will be rehabilitated and enlarged for use by the park's protection division. The Nash Farm will be preserved as a dairy farm of the 1940s with its structures adapted for use as an environmental education center and outdoor laboratory managed by the National Park Service or a National Park Service Partner. At the Murphy Farm, the civil war earthworks and the foundations of John Brown's fort will be stabilized, and the Chambers/Murphy House studied to determine the best use for it. A bus stop and trail to the earthworks and foundations will be developed. Restrooms and drinking water will also be developed at the site.

Schoolhouse Ridge will also be managed as a battlefield landscape with agricultural leases that maintain the 1862 appearance. The nonhistoric campground which has been closed since the 1970's will be removed and the Harpers Ferry Caverns restored to a more natural appearance. Nonhistoric structures will be removed. Onsite interpretation and occasional interpretive demonstrations with a military focus will be provided. Bus parking and trails will be developed.

At the Potoma Wayside, upgraded takeout facilities will be developed to facilitate river use. The takeout will be hardened and restroom facilities provided. To the extent possible, parking will also be upgraded. Interpretation will be provided by the concessioner.

On Loudoun Heights, the Sherwood House will be removed and the site developed as a Civil War overlook. All Civil War camps and earthworks will be stabilized as necessary. The majority of the site will be maintained for its natural resources. Short Hill will be managed similarly.

Maryland Heights will undergo stabilization of earthworks and fortifications as necessary and restoration of line of fire vistas. Historic roads will continue to be used and maintained. A more comprehensive level of interpretation will be achieved through wayside exhibits, site brochures and occasional ranger-guided hikes.

#### **Summary of Anticipated Consequences**

Impacts on historic structures, archeological resources, and cultural landscapes are not anticipated to be adverse. No impacts on water resources, floodplains, soils, vegetative communities, fish and wildlife, or lightscapes are expected to have more than a

minor adverse impact. A beneficial impact on cave resources, no impact on special status species, and a minor adverse impact on state-listed species are expected. Both short-term minor to moderate adverse impacts and long-term moderate beneficial impacts on soundscapes were identified. A beneficial impact on the visitor experience and short-term minor adverse/long-term beneficial impacts on National Park Service operations are anticipated. Implementing the selected alternative will have a long-term, beneficial effect on the economy of the gateway communities and a long-term beneficial effect on the regional economy.

### **Boundary Modification**

No boundary modifications are proposed in the selected alternative.

### **Mitigating Measures/Monitoring**

#### Historic Structures

All structures within the national historical park will be treated as eligible for inclusion on the National Register of Historic Places until officially determined otherwise. All proposed treatments and uses of historic structures will be undertaken in accordance with the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*, and the National Park Service *Director's Order--28, the Cultural Resources Management Guideline*. All proposed work on historic structures will require prior consultation with the appropriate (West Virginia, Maryland, or Virginia) state historic preservation officer.

#### Cultural Landscapes

All cultural landscapes within the national historical park will be evaluated for inclusion on the National Register of Historic Places. The appropriate level of preservation for each landscape will be determined and, in accordance with "*The Secretary of the Interior's Standards and Guidelines for the Treatment of Cultural Landscapes*."

#### Archeological Resources

A program of survey, identification and evaluation of archeological resources will be developed and initiated. Eligible sites will be nominated to the National Register of Historic Places. The condition of known sites will be periodically monitored and assessed in order to better preserve them. The appropriate state historic preservation officer will be consulted to determine the best means of conducting data recovery when needed and preservation/protection measures to be implemented during ground disturbance activities.

#### Exotic Species

A parkwide inventory of plants and animals will be completed and a program developed for reversing the destructive effects of exotic species. The landscape will be managed for native plant species in non-agricultural areas. Exotic species, where feasible and desirable, will be controlled or eliminated. Interpretive/educational outreach to visitors and neighbors will be provided to explain the purpose and need for exotic species management.

#### Integrated Pest Management

Pesticide use will be coordinated with CSX Railroad within park boundaries. The use of pesticides will be monitored to protect streams, rivers, and other riparian areas.

#### Soundscapes

Tour bus companies will be required to comply with noise reduction regulations. The level of noise output will be a consideration when procuring and using equipment.

#### Lightscaapes

All new outdoor lighting throughout the national historical park will be designed to be the minimum necessary for safety or security and that prevents stray light from spreading upward into the night sky. Existing lighting that contributes to light pollution will be replaced with fixtures more sensitive to the resource.

#### Threatened and Endangered Species (T & E)

Federal, state, and locally listed T & E species will be inventoried, monitored, and managed. Research that contributes to knowledge of these species will be encouraged. Sensitive habitats will be maintained and enhanced and management plans will be modified to be more effective.

#### Water Resources/Wetlands

Streams and wetlands park-wide will be monitored and best management practices implemented for pollution generating activities and facilities. The use of pesticides and fertilizers will be minimized. The national historical park will work with other bay program partners to manage the Chesapeake Bay watershed as a cohesive ecosystem and work toward restoration, conservation and interpretation of the bay's resources. National historical park wetlands will be inventoried and sufficient buffer width established to reduce sediment loads entering the Shenandoah and Potomac Rivers and their tributaries. River banks will be stabilized and degraded sections of streams and wetlands restored within the national historical park.

### Floodplains

A flood awareness, preparedness, and warning system is already in place to evacuate Lower Town and low-lying areas during flooding and to warn visitors of flooded areas of the park. No new mitigation is identified in the selected alternative.

### Cave and Karst Resources

To the extent possible, caverns within the park will be restored to a more natural condition, with a more natural air flow and measures to encourage native bat habitat.

### Transportation

The national historical park will work with the appropriate state department of transportation to minimize the impact of road work proposed for U.S. Highway 340 on the national historical park's natural, cultural, and visual resources. The national historical park will also work with the towns of Harpers Ferry and Bolivar to coordinate street work and minimize impacts on residents and on park staff and visitors.

## **OTHER ALTERNATIVES CONSIDERED**

The "no-action" alternative (alternative 1) would have continued existing National Park Service management and trends. It serves as a basis for comparison in evaluating the other alternatives. In Alternative 3, Harpers Ferry National Historical Park would have become a gateway to the West Virginia, Maryland, and Virginia region through a cooperative visitor center complex at Cavalier Heights. Through the use of partners and concessioners the park would have increased its ability to bring life and activity to all areas of the park. This partnership would have allowed additional interpretation, preservation of additional historic resources, and maintenance of facilities as well as a seamless transportation system that served both the park and the local community. An Around-the-Park trail would have connected the park to the regional trail system. A new headquarters building and maintenance facility would have been constructed outside Camp Hill to allow restoration of the historic structures for interpretive purposes and the landscape to the Storer College period. The Shipley School would have been removed and the site landscaped.

## **BASIS FOR DECISION**

Alternative 2 was the National Park Service preferred alternative and was selected because it allows the most visitor access to the most locations within the park via an expanded transportation system. The transportation system allows for improved access to the Murphy Farm, Schoolhouse Ridge, and the Nash Farm, and makes development of these sites as an interpretive focus possible. The selected alternative provides the opportunity to revitalize Lower Town that was lost over the years. It makes Camp Hill more of a focus of park interpretation with structures reflecting the period 1867-1955 and additional emphasis on the Storer College story. The selected alternative also call for improvements to the existing visitor contact station to function as the orientation and interpretive introduction to the park and its resources. The selected alternative places new emphasis on the workings of the canal system by stabilizing and re-watering the canal along the Potomac River and making the power plant an interpretive focus within the park.

Alternative 1 the, "no action" alternative, and alternative 3 do not provide the same level of site access, and do not provide the same diversity of interpretive themes as the selected alternative.

## **FINDINGS ON APPROPRIATE USE AND IMPAIRMENT OF PARK RESOURCES AND VALUES**

Sections 1.5 and 8.12 of National Park Service *Management Policies 2006* underscore the fact that not all uses are allowable or appropriate in units of the National Park System. The proposed use (selected alternative) was reviewed and analyzed to determine consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects to park resources; total costs to the National Park Service; and whether the public interest would be served. Therefore, the National Park Service finds that the selected alternative is an appropriate use.

Impairment occurs when, in the professional judgment of the responsible National Park Service manager, harm to the integrity of park resources or values (including opportunities for enjoyment of those resources or values) results from the proposed action. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects



of the impact; and the cumulative effects of the impact when combined with other impacts.

Impact topics analyzed in detail were historic structures, archeological resources, cultural landscapes, water resources (including wetlands), floodplains, soils, cave resources, vegetative communities, fish and wildlife, special status species, soundscapes, lightscapes, visitor use and experience, socioeconomic environment, and National Park Service operations.

In analyzing impairment in the National Environmental Policy Act (NEPA) analysis for this plan the National Park Service took into account the fact that if impairment were likely to occur, such impacts would be considered to be major or significant under Council on Environmental Quality (CEQ) regulations. The National Park Service guidance documents note that not all major or significant impacts under a NEPA analysis are impairments. However, all impairments to National Park Service resources and values would constitute a major or significant impact under NEPA. If an impact results in impairment, the action should be modified to lessen the impact level. If the impairment cannot be avoided by modifying the proposed action, that action cannot be selected for implementation.

After impact analysis, it was determined that because there would be no major adverse impacts to resources whose conservation is (1) necessary to fulfill specific purposes in the establishing legislation for Harpers Ferry National Historical Park; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in relevant National Park Service planning documents, there would be no impairment of the park's resources or values as a result of implementing the selected alternative.

This conclusion is based on the Superintendent's professional judgment, as guided and informed by resource specialists, previous planning documents, consultation with appropriate federal and state agencies, and applicable laws and policies.

#### **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The environmentally preferable alternative is determined by applying the criteria suggested in the NEPA of 1969, which is guided by CEQ. The CEQ provides direction that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's §101: (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) assure for all

Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradations, risk to health or safety, or other undesirable and unintended consequences; (4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety, of individual choice; (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."

Alternative 1 (no action) represents a continuation of the present course of park management. The no-action alternative would respond to resource impacts and visitor demands as they occur rather than formulating a plan to address potential issues proactively. Because of this, it lacks the range of diversity found in the other alternatives. It also does not provide as much resource protection as the other alternatives -- more resource impacts would be expected with increasing use levels in the no-action alternative. Thus, compared with the environmentally preferable alternative, the no-action alternative fulfills to a lesser degree the following national environmental policy goals:

- attain the widest range of beneficial uses of the environment without degradation (#3)
- preserve important natural aspects and maintain an environment that supports diversity and variety of individual choice (#4)
- achieve a balance between population and resource use (#5)

Alternative 2 (environmentally preferable alternative and the selected alternative) provides a high level of protection of natural and cultural resources while concurrently providing for a wide range of neutral and beneficial uses of the environment, fully meeting goals 3 and 5. This alternative integrates resource protection while maintaining an environment that supports a diversity and variety of appropriate visitor uses, fully meeting goals 2 and 4. The selected alternative surpasses the other alternatives in realizing the national environmental policy goals.

Alternative 3, through zoning, has a slight reduction in the size of developable portions of the national historical park, which would partially fulfill resource preservation goals (3 and 4). Visitor use opportunities at Harpers Ferry would be expanded fulfilling visitor experience goals 2 and 5. However, with the

expansion of trails on Short Hill, there could be a greater potential for impacts on bald eagles, a state listed species. Thus, alternative 3 does not meet the policy goals as well as alternative 2 regarding attainment of the widest range of beneficial uses without resource degradation and risk to health or safety and preserving important cultural and natural resources.

After analyzing each of the alternatives with all applicable goals, the planning team has determined that the environmentally preferable alternative for Harpers Ferry National Historical Park is alternative 2, the National Park Service preferred alternative and the selected alternative.

#### **PUBLIC AND AGENCY INVOLVEMENT**

The Notice of Intent (NOI) to prepare this Environmental Impact Statement was published in the *Federal Register* August 28, 2003. The NOI indicated the beginning of the initial scoping period, during which comments were accepted through January 2004. The first newsletter, issued at that time described purpose and significance statements for the park, as well as identified preliminary issues. Public scoping meetings were held in January 2004 in Shepherdstown and Harpers Ferry, West Virginia. The National Park Service also met with city, county, and state agencies several times in 2003 and 2004. The National Park Service received over 200 comments in the meetings and on mail-back comment forms included in the first newsletter which were considered by the planning team when developing the alternatives.

A second newsletter, distributed in May 2004, described the range of preliminary alternatives for managing the national historical park. Numerous comments were received in response to this newsletter that offered ideas on how to improve the alternatives.

About 3,200 copies of the *Draft GMP/EIS* were mailed for public and agency review in August 2008. Two meetings with the public and one with county commissioners were held in September 2008 to receive comments on the draft plan. An additional public meeting was held in June 2009 in Bolivar, West Virginia. A total of 24 people attended these meetings.

In addition to comments received at the meetings, the National Park Service received 34 written and electronic comments on the EIS. Several comments requested clarification or additional explanation of specifics in the alternatives or the environmental analysis. Others provided additional information or suggested ideas to add to

the plan. No substantive comments were received but the National Park Service responded to all comments in the final GMP/EIS.

### **Consultation and Coordination**

A number of meetings were held with city, county, and state agencies to discuss possible planning issues and preliminary alternatives. Comments on the draft plan were received from several state agencies and the Environmental Protection Agency.

#### Section 106 Consultation (National Historic Preservation Act)

Agencies that have direct or indirect jurisdiction over historic properties are required by Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470, et seq.) to take into account the effect of any undertaking on properties listed or eligible for listing in the National Register of Historic Places. To meet the requirements of 36 CFR 800, the National Park Service sent letters to the state historic preservation officers in West Virginia, Maryland, and Virginia, and the Advisory Council on Historic Preservation on January 6, 2004, informing them of the planning process and inviting their participation. These offices were also sent a copy of the draft GMP/EIS. A response was received from the Maryland State Historic Preservation Officer concurring with the National Park Service selected alternative (November 17, 2008). Neither Virginia nor West Virginia provided comments on the draft GMP/EIS.

Implementation of this GMP/EIS will be undertaken in accordance with the 2008 Programmatic Agreement among the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers and the National Park Service. Under that agreement, actions meeting the criteria for a Streamlined Review Process do not require further consultation unless specifically requested by the involved state historic preservation officer. All other actions proposed in the plan must undergo further review under Section 106 of the National Historic Preservation Act of 1966, as amended.

#### Section 7 Consultation (Endangered Species Act)

During the preparation of this document, National Park Service staff consulted informally with the U.S. Fish and Wildlife Service offices in West Virginia, Maryland, and Virginia. The list of potentially affected threatened and endangered species was compiled using lists and information received from the U.S. Fish and Wildlife Service.

In accordance with the Endangered Species Act and relevant regulations of 50 CFR Part 402, the National Park Service determined that the GMP is not likely to adversely affect any federally threatened or endangered species and sent a copy of the draft GMP to the U.S. Fish and Wildlife Service with a request for written concurrence. Responses received indicated that the various U.S. Fish and Wildlife Service offices had no comment or issues with the draft GMP/EIS.

The National Park Service has committed to consult on future actions conducted under the framework described in this GMP/EIS to ensure that such actions are not likely to adversely affect threatened or endangered species.

## **CONCLUSION**

As described in the *Mitigation Measures/Monitoring* section, all practical and feasible means to avoid or minimize environmental harm from the selected alternative have been identified. Because there would be no major adverse impacts to resources whose conservation is (1) necessary to fulfill specific purposes in the establishing legislation for Harpers Ferry National Historical Park; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in relevant National Park Service planning documents, there would be no impairment of the park's resources or values. After a review of potential effects, the alternative selected for implementation will not impair park resources or values and will not violate the National Park Service Organic Act.